

For Six Month Period Ending DEC 31 1985  
(Insert date)

Name of Registrant

Registration No. 508

Cleary, Gottlieb, Steen & Hamilton

Business Address of Registrant

1 - One State Street Plaza, New York, New York 10004  
2 - 1752 N Street, N.W., Washington, D.C. 20036

I-REGISTRANT

1. Has there been a change in the information previously furnished in connection with the following:

(a) If an individual:

(1) Residence address	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(2) Citizenship	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(3) Occupation	Yes <input type="checkbox"/>	No <input type="checkbox"/>

(b) If an organization:

(1) Name	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(2) Ownership or control	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(3) Branch offices	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

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CRIMINAL DIVISION  
JUN 31 4 37 PM '85  
INTERNAL SECURITY  
SECTION  
REGISTRATION UNIT

2. Explain fully all changes, if any, indicated in item 1.

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, and 5.

3. Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish the following information:

Name	Position	Date Connection Ended
Evan Davis	Partner	Resigned September 1, 1985

4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?  
 Yes ☒ No ☐

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Citizenship</i>	<i>Position</i>	<i>Date Assumed</i>
See Rider 4				

5. Has any person named in Item 4 rendered services directly in furtherance of the interests of any foreign principal?  
 Yes ☐ No ☒

If yes, identify each such person and describe his services.

6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Position or connection</i>	<i>Date terminated</i>
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7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Position or connection</i>	<i>Date connection began</i>
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## II—FOREIGN PRINCIPAL

(PAGE 3)

8. Has your connection with any foreign principal ended during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

*Name of foreign principal*

*Date of Termination*

9. Have you acquired any new foreign principal<sup>1</sup> during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish following information:

*Name and address of foreign principal*

*Date acquired*

Peugeot S.A.  
75 Avenue de la Grande Armee  
Paris, France 75016

November 1, 1985

10. In addition to those named in Items 8 and 9, if any, list the foreign principals<sup>1</sup> whom you continued to represent during the 6 month reporting period.

CSR Limited, Sydney, Australia

## III—ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9, and 10 of this statement? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail your activities and services:

See Rider 11

<sup>1</sup>The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)).

A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity<sup>2</sup> as defined below?

Yes ☒ No ☐

See response to Question 11, including Rider 11

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

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13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals? Yes ☐ No ☒

If yes, describe fully.

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<sup>2</sup>The term "political activities" means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

## IV—FINANCIAL INFORMATION

## 14. (a) RECEIPTS—MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes ☒ No ☐

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.<sup>3</sup>

<i>Date</i>	<i>From Whom</i>	<i>Purpose</i>	<i>Amount</i>
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See Rider 14 (a)

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Total

## (b) RECEIPTS—THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value<sup>4</sup> other than money from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name of foreign principal</i>	<i>Date received</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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<sup>3</sup>A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(e).

<sup>4</sup>Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) **DISBURSEMENTS—MONIES**

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement?      Yes ☒      No ☐

(2) transmitted monies to any such foreign principal?      Yes ☐      No ☒

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

<i>Date</i>	<i>To Whom</i>	<i>Purpose</i>	<i>Amount</i>
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See Rider 15(a)

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Total

## 15. (b) DISBURSEMENTS—THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value<sup>5</sup> other than money in furtherance of or in connection with activities on behalf of any foreign principal named in items 8, 9 and 10 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Date disposed</i>	<i>Name of person to whom given</i>	<i>On behalf of what foreign principal</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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## (c) DISBURSEMENTS—POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value<sup>5</sup> in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Date</i>	<i>Amount or thing of value</i>	<i>Name of political organization</i>	<i>Name of candidate</i>
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**V—POLITICAL PROPAGANDA**

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any political propaganda as defined above? Yes ☒ No ☐

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

17. Identify each such foreign principal.

CSR Limited, Sydney, Australia

<sup>5</sup>Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating political propaganda? Yes ☐ No ☒

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of political propaganda include the use of any of the following:

☐ Radio or TV broadcasts    ☐ Magazine or newspaper articles    ☐ Motion picture films    ☐ Letters or telegrams  
☐ Advertising campaigns    ☐ Press releases    ☐ Pamphlets or other publications    ☐ Lectures or speeches

☒ Other (specify) Submission of comments to government agency

20. During this 6 month reporting period, did you disseminate or cause to be disseminated political propaganda among any of the following groups:

☐ Public Officials    ☐ Newspapers    ☐ Libraries  
☐ Legislators    ☐ Editors    ☐ Educational institutions  
☒ Government agencies    ☐ Civic groups or associations    ☐ Nationality groups  
☒ Other (specify) Embassy of Australia; other participants in government agency proceeding

21. What language was used in this political propaganda:

☒ English    ☐ Other (specify) \_\_\_\_\_

22. Did you file with the Registration Section, U.S. Department of Justice, two copies of each item of political propaganda material disseminated or caused to be disseminated during this 6 month reporting period? Yes ☒ No ☐

23. Did you label each item of such political propaganda material with the statement required by Section 4(b) of the Act? Yes ☒ No ☐

24. Did you file with the Registration Section, U.S. Department of Justice, a Dissemination Report for each item of such political propaganda material as required by Rule 401 under the Act? Yes ☒ No ☐

## VI—EXHIBITS AND ATTACHMENTS

### 25. EXHIBITS A AND B

- (a) Have you filed for each of the newly acquired foreign principals in Item 9 the following:

Exhibit A<sup>6</sup>    Yes ☒    No ☐  
 Exhibit B<sup>7</sup>    Yes ☒    No ☐

If no, please attach the required exhibit.

- (b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period? Yes ☐ No ☒

If yes, have you filed an amendment to these exhibits? Yes ☐ No ☐

If no, please attach the required amendment.

<sup>6</sup>The Exhibit A, which is filed on Form CRM-157 (Formerly OBD-67) sets forth the information required to be disclosed concerning each foreign principal.

<sup>7</sup>The Exhibit B, which is filed on Form CRM-155 (Formerly OBD-65) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.



## 26. EXHIBIT C

If you have previously filed an Exhibit C<sup>8</sup>, state whether any changes therein have occurred during this 6 month reporting period. Yes ☐ No ☐ Not applicable

If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐

If no, please attach the required amendment.

## 27. SHORT FORM REGISTRATION STATEMENT

Have short form registration statements been filed by all of the persons named in Items 5 and 7 of the supplemental statement?

Yes ☐ No ☐ Not applicable

If no, list names of persons who have not filed the required statement.

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this registration statement and the attached exhibits and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within his (their) personal knowledge.

(Type or print name under each signature)

(Both copies of this statement shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

J. Eugene Marans

Douglas E. Kliever

Daniel B. Silver

John S. Magney

Subscribed and sworn to before me at Washington, D.C.

this 31st day of January, 19 86

Dorothy V. Baker  
(Signature of notary or other officer)

My Commission Expires August 31, 1990

<sup>8</sup>The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, U.S. Department of Justice, Washington, D.C. 20530.)

RIDER 4: NEW PARTNERS/EUROPEAN COUNSEL

<u>Name</u>	<u>Residence Address</u>	<u>Citizenship</u>	<u>Position</u>	<u>Date Assumed</u>
Jonathan I. Blackman	175 Congress St. Apartment #2R Brooklyn, NY 11201	U.S.	Partner	11/1/85
Robert Bordeaux- Groult	118, rue du Bac 75007 Paris	U.S.	Partner	11/1/85
Francois Jonemann	37, rue de Miromesnil 75008 Paris	French	Partner	11/1/85
Jan Meyers	Grote Molenweg, 92 3020 Herent Belgium	Belgian	European Counsel	11/1/85

## RIDER 11: ACTIVITIES

Registrant acts as counsel to CSR Limited, marketing agent for the Queensland Sugar Board. In this capacity, during the period registrant advised the Company with respect to regulations concerning the U.S. sugar market and with respect to administrative and legislative proposals relating to the U.S. sugar market. In this connection, registrant was from time to time during the period in telephonic communication with officials of the U.S. Department of Agriculture, the Office of the U.S. Trade Representative, the U.S. International Trade Commission and the U.S. Customs Service in order to obtain information regarding the foregoing subjects.

Registrant was from time to time during the period in telephonic communication with officials of the Australian Embassy to the United States with respect to matters concerning the authorized quarterly shipping pattern of raw sugar from Australia under the U.S. Program.

Registrant assisted in the preparation of a post-hearing brief and submitted same to the United States International Trade Commission in connection with the Commission's investigation of the effect of sugar import fees on the sugar program.

### Peugeot S.A.

Registrant provides legal services to Peugeot S.A., only some of which may be regarded as requiring registration under the Foreign Agents Registration Act of 1938.

During the period, registrant advised Peugeot S.A. concerning the prospects for the grant of certiorari by the Supreme Court of the United States in two cases pending before the Court, Anscheutz & Co., GmbH v. Mississippi River Bridge Authority, No. 85-98 and Messerschmitt Bolkow Blohm GmbH v. Walker, No. 85-99. In this regard, registrant was from time to time in telephonic communication with officials of the Office of the Legal Adviser, U.S. Department of State, the Office of Foreign Litigation, U.S. Department of Justice and the Office of the Solicitor General, U.S. Department of Justice. In addition, registrant attended meetings on October 31, 1985 with officials of the Office of the Legal Adviser, U.S. Department of State and on November 7, 1985 with officials of the Office of Foreign Litigation, U.S. Department of Justice. The purpose of such telephone calls and meetings was to advise such officials of the views of Peugeot S.A. on the question whether certiorari should be granted in the above-mentioned cases.

RIDER 14(a): RECEIPTS - MONIES

CSR Limited

8/22/85	Fees	\$ 13,000.00
	Disbursements	<u>1,331.54</u>
	TOTAL:	\$ 14,331.54

Peugeot S.A.

7/2/85	Fees	\$255,000.00
	Disbursements	28,763.58
8/5/85	Fees	1,500.00
	Disbursements	6,004.36
10/31/85	Fees	1,100.00
	Disbursements	438.95
11/19/85	Fees	145,000.00
	Disbursements	21,718.31
11/26/85	Fees	7,500.00
	Disbursements	439.14
12/2/85	Fees	11,500.00
	Disbursements	730.03
12/10/85	Fees	1,100.00
	Disbursements	<u>187.59</u>
	TOTAL:	\$532,889.49

RIDER 15(a): DISBURSEMENTS - MONIES

CSR Limited

C & P Telephone Washington, D.C.	Tolls	351.12
ITT World Communications Hicksville, N.Y.	Telexes	225.79
Other Communication	Tolls, Allocation of indirect expenses	315.50
International Club Washington, D.C.	Conference	174.34
Miscellaneous In-House Expenses Washington, D.C.	Overtime Stenography	51.75
	Word Processing	9.10
	Duplicating Documents	109.50
	Messenger Service	123.00
	Postage	44.08
	Local Transportation	85.60
	TOTAL:	1,489.78

RIDER 15(a): DISBURSEMENTS - MONIES (continued)

PEUGEOT S.A.

New York Telephone Co. New York, N.Y.	Tolls	2,039.81
Other Communication	Tolls, Allocation of indirect expenses	1,359.88
Federal Express Memphis, TN	Shipping	662.55
Network Courier Los Angeles, CA	Shipping	165.00
RCA Global Communications New York, N.Y.	Telexes	143.33
Eastern Connection Miami, FL	Shipping	25.50
Western Union Atlanta, GA	Telexes	6.08
Service Systems New York, N.Y.	Meals	201.30
Charge & Travel New York, N.Y.	Local Fares	10.70
Escort Corporation New York, N.Y.	Local Fares	656.65
Fone A Cab New York, N.Y.	Local Fares	452.10
Ace Limousine New York, N.Y.	Local Fares	40.80
American Express Phoenix, AZ	Travel	1,413.24
Travel Corp. of America New York, N.Y.	Travel	7,396.63
The Royal Hotel Paris, France	Travel	1,970.54
The Broadmoor Hotel Colorado Springs, CO	Travel	10.26

C T Corporation System New York, N.Y.	Documents	6.14
Bureau of National Affairs Washington, D.C.	Documents	15.00
Federal Document Retrieval Albany, N.Y.	Documents	235.50
Disclosure, Inc. Bethesda, MD	Documents	68.07
BNA International Inc. London, England	Subscription	22.77
U.S. Chamber of Commerce Washington, D.C.	Subscription	4.00
VA Journal of Int'l Law Charlottesville, VA	Subscription	2.27
Burns, Lobato & Adams New York, N.Y.	Professional Services	5,928.86
Hankin Reporting Service New York, N.Y.	Transcript	253.65
Mead Data Central Atlanta, GA	Lexis	920.07
Miscellaneous In-House Expenses New York, N.Y. Washington, D.C.	Overtime Stenography	4,405.67
	Duplicating Documents	2,749.03
	Word Processing	9,969.63
	Messenger Service	483.44
	Postage	124.83
	Local Transportation	522.59
	Supplies	76.57
	Allocation of indirect Lexis expense	460.05
	TOTAL:	42,802.51

UNITED STATES DEPARTMENT OF JUSTICE  
REGISTRATION UNIT  
CRIMINAL DIVISION  
WASHINGTON, D.C. 20530

Partner	Title
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